

Pass & ID E₀ Check Tips

Effective 1 October 1998, all vehicles registered on base will be required to successfully undergo vehicle emissions testing prior to renewing or receiving a new base sticker. This applies to both Civilian and Military personnel, no matter where their vehicles are registered. They will need to produce an E₀ Check certificate showing they have passed emissions testing.

Vehicles registered in the following counties already undergo E₀ Check in order to receive State registration. They do **NOT** have to produce an E₀ Check certificate to register on base: **Butler, Clark, Clermont, Cuyahoga, Geauga, Greene, Hamilton, Lake, Loraine, Medina, Montgomery, Portage, Summit, and Warren.**

The Ohio law exempts certain vehicles from undergoing E₀ Check. These include: vehicles less than two years old, vehicles over 25 years old, registered historic vehicles, recreational vehicles, motorcycles, electric and alternatively fueled vehicles, farm vehicles, and large commercial vehicles.

The following groups are not "employees" or are on base less than 60-days per year and are exempt: Reservists, Retirees, Visitors. Reservists and retirees who are also active base employees are not exempt from E₀ Check requirements (for example, retired military members who now work as civil servants).

People assigned to recruiting stations or ROTC posts outside the E₀ Check counties are also exempt. Those assigned to ROTC units must show PCS orders with a duty location other than WPAFB or the E₀ Check counties.

Volunteers are not employees and are therefore exempt. This applies to volunteers at the AF Museum, Hospital (Red Cross), Fisher House, Family Services, Chapel etc. They should have an AFMC Form 496 completed, or other official paperwork that indicates their status as "Volunteer." Again, this exemption does not apply to base employees who are also volunteers.

Some military members whose vehicles are registered in another state may undergo an equivalent test in their home state. If the military member has actually had their vehicle emissions tested in the past two years, they can sign a "Self-Certification Form" (see attached). They will then not require an Ohio E₀ Check. It is important to ask if they have had their vehicle tested, because some states, like Ohio, exempt military members from vehicle emissions testing if they are stationed out-of-state.

Please provide the handouts to those needing to know the location of E₀ Check stations.

11 August 2003

Additional Pass & ID EÖ Check Guidance

The requirement to EÖ Check privately-owned vehicles driven on Wright-Patterson AFB is driven by the Clean Air Act (CAA) Amendments, passed by Congress in 1990. Section 118 of the CAA is entitled "Control of Pollution from Federal Facilities." Subparagraph (d) is entitled "Vehicles Operated on Federal Installations," and this is where the requirement for EÖ Check compliance is levied by Congress. This section of the law clearly states that each Federal facility "shall require all employees which operate motor vehicles on the property or facility to furnish proof of compliance with the applicable requirements of any vehicle inspection and maintenance program...for the State in which such property or facility is located (without regard to whether such vehicles are registered in the State)."

When Congress passes an environmental law, it is up to the U.S. EPA to develop regulations to implement the law. These regulations are contained in Section 40 of the Code of Federal Regulations (CFR). The specific section of the CFR covering compliance with EÖ Check is 40 CFR 51.356. Subparagraph (a)(4) of this CFR states that "Vehicles which are operated on Federal installations located within an I/M program area shall be tested, regardless of whether the vehicles are registered in the state or local I/M area. This requirement applies to all employee-owned or leased vehicles (including vehicles owned, leased, or operated by civilian and military personnel on Federal installations) as well as agency-owned or operated vehicles, except tactical military vehicles, operated on the installation."

Each state typically has their own regulations for enforcing federal requirements. Section 3745-26-12 of the Ohio Administrative Code covers the State Vehicle Inspection and Maintenance (I/M) program, with which the base must comply. Subsection (A)(2) of this regulation states that "Pursuant to 40 CFR part 51.356, unless otherwise exempt pursuant to division (F)(3) of section 3704.14 of the Revised Code, each motor vehicle that is owned or leased by the federal government or its employees and is operated on a federal installation within a county that is part of a designated program area is subject to inspection." The reference to the vehicles that are "otherwise exempt" is for historical vehicles, recreational vehicles, motorcycles, farm vehicles, large commercial vehicles, and electric vehicles. These exemptions are covered under Ohio law, which are all listed in the Ohio Revised Code.

If anyone would like to read the applicable laws and regulations, they are now contained on the 88th ABW Office of Environmental Management web page. The regulations are found under the Air Quality section, where the specific CFR and OAC regulations are listed. The applicable portions of the regulations/laws are highlighted, but it is also possible to read the surrounding material. If people want additional information, they can visit the links provided.

11 August 2003